## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

GEOTAG, INC.,	
v.	2:12-cv-00043-MHS-CMC
CANON INC., et al.	

# GEOTAG, INC.'S RESPONSE TO DEFENDANT CANON USA, INC.'S MOTION TO EXTEND THE DEADLINE TO FILE A MOTION TO TRANSFER

On June 20, 2012, counsel for Defendant Canon USA, Inc., contacted counsel for Plaintiff GeoTag, Inc., requesting a 30-day extension of the deadline to file a motion to transfer. GeoTag's counsel informed counsel for Canon that it was opposed to such an extension. GeoTag's counsel, however, informed Canon's counsel that GeoTag would make a special exception in this one instance and agree to a three business day extension of the deadline for Canon to file a motion to transfer as a personal accommodation to Canon's counsel, who worked with Plaintiff's counsel at his previous law firm.

Dated: June 21, 2012 Respectfully submitted,

#### **BUETHER JOE & CARPENTER, LLC**

By: /s/ Eric W. Buether

Eric W. Buether

State Bar No. 03316880

Eric.Buether@BJCIPLaw.com

Christopher M. Joe

State Bar No. 00787770

Chris.Joe@BJCIPLaw.com

Brian A. Carpenter

State Bar No. 03840600

Brian.Carpenter@BJCIPLaw.com

Mark D. Perantie

State Bar No. 24053647

Mark.Perantie@BJCIPLaw.com

Niky Bukovcan

State Bar No. 24078287

Niky.Bukovcan@BJCIPLaw.com

Monica Tavakoli

State Bar No. 24065822

Monica.Tavakoli@BJCIPLaw.com

1700 Pacific Avenue, Suite 4750

Dallas, Texas 75201

Telephone: (214) 466-1271 Facsimile: (214) 635-1827

## NI LAW FIRM, PLLC

Hao Ni

State Bar No. 24047205

hni@nilawfirm.com

3102 Maple Avenue

Suite 400

Dallas, Texas 75201

Telephone: (214) 800-2208 Facsimile: (214) 800-2209

ATTORNEYS FOR PLAINTIFF GEOTAG, INC.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a) on this 21st day of June, 2012. Any other counsel of record will be served by facsimile transmission.

/s/ Eric W. Buether
Eric W. Buether